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WARLITO DACQUEL DAGDAGAN and DOMITILLA ORDONEZ DAGDAGAN

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

IN RE:)	Bankruptcy Case No. 13-21662-D-7
)	Chapter 7
)	
WARLITO DACQUEL DAGDAGAN)	DC No. BMV-01
AND)	
DOMITILLA ORDONEZ DAGDAGAN,)	
)	MOTION TO COMPEL TRUSTEE TO
)	ABANDON THE DEBTORS BUSINESS
Debtors.)	
_____)	

The motion of WARLITO DACQUEL DAGDAGAN and DOMITILLA ORDONEZ DAGDAGAN, debtors and petitioners herein, respectfully represents:

1. Petitioners are the debtors in the above-captioned Chapter 7 bankruptcy case, having filed his petition for relief on February 7, 2013. Their 341 Meeting is scheduled to be held on March 13, 2013 at 3:00 pm at 501 "I" Street, Room 7B, Sacramento, CA.

2. Debtors are both retired but the Joint Debtor operates a small childcare business as indicated in their Statement of Financial Affairs.

3. On March 2, 2013, the Trustee informed Debtors' Counsel to advise Joint Debtor to cease operating her childcare business immediately because she is prohibited from operating a business in a Chapter 7 bankruptcy without a court order.

4. Debtors argue that the value of the childcare business is of inconsequential or of little value and benefit to the estate. However, the operation of the business is necessary for the livelihood of the debtors to enable them to continue to pay for their daily living expenses.

1 WHEREFORE, Debtors and Petitioners respectfully request for an Order Compelling the
2 Trustee to Abandon the Business in favor of the Debtors because it is of inconsequential value
3 and benefit to the estate under 11 USC § 554 (b) but of great value to the Debtors livelihood.

4 Dated: March 8, 2013

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6 */s/ Bert M. Vega*

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9 Attorney for Debtors
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